

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS (EASTERN DIVISION)

TS Merchandising Ltd., a British Virgin  
Islands corporation, and TS Production  
LLC, a Hungarian limited liability company,

Plaintiffs,

vs.

Case No. 07 C 6518

**DEFENDANTS' MOTION FOR  
SUBSTITUTION OF COUNSEL**

(Assigned to the Hon. Ronald A.  
Guzman)

Dan Hollings, an Arizona resident, and Web  
Services, LLC, an Arizona limited liability  
company,

Defendants.

**DEFENDANTS' MOTION FOR SUBSTITUTION OF COUNSEL**

Defendants Dan Hollings and Web Services, LLC (collectively, "Defendants"), by their attorneys, hereby move to substitute Ungaretti & Harris LLP ("Ungaretti") for Dykema, as local counsel for Defendants. In support hereof, Defendants state as follows.

1. Plaintiffs filed this action on November 16, 2007, alleging claims against these Defendants. Robert B. Groholski of the law firm of Dykema filed an appearance as local counsel on behalf of Defendants.

2. On August 4, 2008, Defendants retained Ungaretti to represent them in this action and have asked that Ungaretti substitute for Dykema as local counsel for

Defendants. If this motion is granted, John T. Ruskusky will file an appearance on behalf of Defendants.

3. Defendants believe that there will be no prejudice or delay to either party if this motion is granted.

WHEREFORE, Defendants Dan Hollings and Web Services LLC request that the Court enter an order:

- (a) Granting John T. Ruskusky of Ungaretti & Harris LLP leave to substitute as counsel for Defendants Hollings and WebServices, in lieu of Robert B. Groholski of Dykema; and
- (b) For any further and additional relief the Court deems appropriate.

A proposed order is submitted to the Court in accordance with its Case Management Order.

DATED: August 11, 2008

Respectfully submitted,

/s/ Jessica Lawrence  
Christopher E. Parker  
Georgia Bar No. 562152 (admitted pro hac vice)  
Jessica C. Lawrence  
Georgia Bar No. 141275 (admitted pro hac vice)  
MOZLEY FINLAYSON & LOGGINS  
One Premier Plaza, Suite 900  
5605 Glenridge Drive  
Atlanta, Georgia 30342  
404.256.0700 (telephone)  
404.250.9355 (facsimile)

/s/ Robert B. Groholski

Robert B. Groholski  
Illinois State Bar No. 6272317  
Dykema Gossett PLLC  
180 North LaSalle Street  
Suite 2700  
Chicago, IL 60601

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF ILLINOIS (EASTERN DIVISION)**

TS Merchandising Ltd., a British Virgin Islands corporation, and TS Production LLC, a Hungarian limited liability company, **CERTIFICATE OF SERVICE**

Plaintiffs,

(Assigned to the Hon. Ronald A. Guzman)

vs.

Dan and Loretta Hollings, Arizona residents, and Web Services, LLC, an Arizona limited liability company,

Defendants.

I hereby certify that on August 11, 2008 I electronically filed the aforementioned **DEFENDANTS' MOTION FOR SUBSTITUTION OF COUNSEL** Complaint using the clerk's ECF System, which system will automatically notify the following counsel of record in this case.

Jessica E. DeMonte  
[jdemonte@ssd.com](mailto:jdemonte@ssd.com)  
Squire, Sanders & Dempsey, LLP  
Three First National Plaza  
70 W. Madison, Suite 2015  
Chicago, IL 60602  
Telephone: (312) 781-1123

Brian A. Cabianca  
[bcabianca@ssd.com](mailto:bcabianca@ssd.com)  
Teresita T. Mercado  
[tmercado@ssd.com](mailto:tmercado@ssd.com)  
Christopher I. Cedillo  
[ccedillo@ssd.com](mailto:ccedillo@ssd.com)  
Squire, Sanders & Dempsey LLP  
Two Renaissance Square  
40 North Central Avenue, Suite 2700  
Phoenix, Arizona 85004-4498

Respectfully submitted this 11<sup>th</sup> day of August, 2008.

\_\_\_\_\_/s/ Jessica C. Lawrence\_\_\_\_\_  
Jessica C. Lawrence  
Georgia State Bar No. 141275  
Admitted Pro Hac Vice

